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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

To: The Commission

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**REQUEST OF JEFFERSON-PILOT COMMUNICATIONS COMPANY
TO WITHDRAW PETITION FOR RECONSIDERATION**

Jefferson-Pilot Communications Company ("Jefferson-Pilot"), licensee of WWBT(TV), NTSC Channel 12, Richmond, Virginia, hereby seeks to withdraw its petition for reconsideration of the Commission's Sixth Report and Order ("Sixth R&O") in the above-referenced docket.¹ Jefferson-Pilot sought reconsideration only with respect to the Commission's allocation and assignment of paired channel 54 to WWBT for digital television ("DTV") service. In lieu of that channel, Jefferson-Pilot requested authority to use DTV channel 11. However, Jefferson-Pilot indicated in its Petition that if its subsequent "engineering studies conclude[d] that channel 11 would not be suitable for WWBT digital broadcasts even with modified operating parameters, Jefferson-Pilot would withdraw its petition in the expectation that its assignment to channel 54 for the DTV transition period would be unaffected."²

¹ FCC 97-115, released April 21, 1997, 62 Fed. Reg. 26684 (May 14, 1997); Petition for Reconsideration of Jefferson-Pilot Communications Company, MM Docket No. 87-268 (filed June 13, 1997) ("Petition").

² Petition at n.2.

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The Commission's records will reflect that WWBT's digital operations on channel 11 were predicted to create a slight amount of interference to the current analog operations of WAVY-TV, NTSC Channel 10, Portsmouth, Virginia, as well as to certain other stations in adjacent markets. Jefferson-Pilot specifically pledged to work with WAVY-TV to address its concerns, and also to take appropriate measures to operate DTV channel 11 in accordance with the Commission's rules for digital service.

Recent and more extensive engineering studies indicate that WWBT may not in fact be able to operate on DTV channel 11 in an acceptable manner.³ Accordingly, Jefferson-Pilot requests that its Petition be deemed withdrawn and that WWBT remain authorized to operate on DTV channel 54, as the Sixth R&Q provides.

Respectfully submitted,

JEFFERSON-PILOT COMMUNICATIONS
COMPANY

By: 

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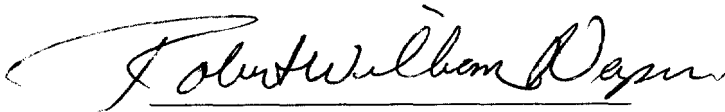
November 5, 1997

³ See Declaration of Robert William Napier, Vice President-Operations, Jefferson Pilot Communications Company, attached.

DECLARATION OF ROBERT WILLIAM NAPIER

I, Robert William Napier, am Vice President-Operations for Jefferson-Pilot Communications Company ("Jefferson-Pilot"), the licensee of WWBT(TV), Richmond, Virginia.

Based upon recent engineering studies, Jefferson-Pilot has concluded that digital operations on channel 11 may not in fact provide acceptable coverage to WWBT's service area. Accordingly, Jefferson-Pilot seeks to withdraw its Petition for Reconsideration of the Commission's Sixth Report and Order in the Advanced Television proceeding and retain its authorization to use channel 54 during the digital television transition period.


Robert William Napier

Date: 11/4/97

I, Linda K. Scott, a Notary Public for Cabarrus County, North Carolina, do hereby certify that Robert William Napier personally came before me this day and acknowledged that he is Vice President-Operations for Jefferson-Pilot Communications Company, the licensee of WWBT-TV, Richmond, VA, and acknowledged, on behalf of Jefferson-Pilot, the due execution of the foregoing instrument.

Witness my hand and official seal, this the 4th day of November, 1997.

My commission expires: May 16, 2002

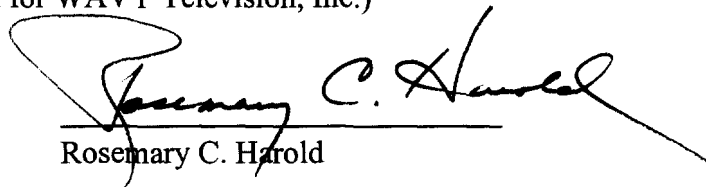

Notary Public

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Request of Jefferson-Pilot Communications Company to Withdraw Petition for Reconsideration was served via First Class mail this 5th day of November, 1997, to the following:

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